



# TYSON & MENDES

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July 20, 2021

**By ECF and Email**  
**(CronanNYSDChambers@nysd.uscourts.gov)**

Hon. John P. Cronan  
United States District Court  
Southern District of New York  
500 Pearl Street, Courtroom 12D  
New York, NY 10007

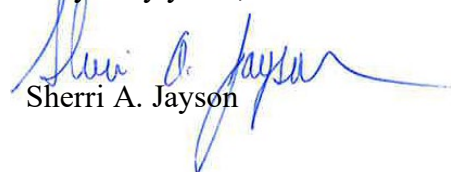
Re: W.P.V., on his own behalf and on behalf of his minor child, W.P.O. v. U.S., et al.  
Docket No.: 21-CV-04436

Your Honor:

As indicated in our letter motion dated June 22, 2021 (ECF Doc. No. 16), our firm has been retained to represent Defendant Cayuga Home for Children, Inc. d/b/a Cayuga Centers ("Cayuga") in this action. Following the Court's Order granting our motion to extend the time to answer and/or submit a pre-answer motion conference request letter (ECF Doc. No. 17), we have engaged in discussions with Plaintiff's counsel as to a possible resolution of the claims against Cayuga. With a view towards a possible resolution, we respectfully request a further extension of time to answer and/or to file a pre-answer motion to dismiss conference request letter on behalf of Cayuga to August 16, 2021. Plaintiff's counsel consents to this application.

In addition, we join in and consent to the Government's letter motion (ECF Doc. 19) requesting that the initial conference scheduled for August 3, 2021 at 10 a.m. be adjourned *sine die*.

Very truly yours,



Sherri A. Jayson

cc: Aamir Kazi, Esq. (kazi@fr.com)  
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